

**UNITED STATES COURT OF APPEALS  
DISTRICT OF COLUMBIA CIRCUIT**

SHAWN MUSGRAVE,

Appellant,

v.

MARK WARNER, *et al.*,

Appellees.

Case No. 22-5252

\* \* \* \* \*

**APPELLANT’S CONSENT MOTION FOR ENLARGEMENT  
OF TIME WITHIN WHICH TO FILE OPENING BRIEF**

Appellant Shawn Musgrave (“Musgrave”), by and through undersigned counsel, respectfully moves this Court for a thirty-day extension of the deadline for filing his Opening Brief, which is currently due today, 11 January 2023. This Motion proposes the following briefing schedule:

- 10 February 2023 – Appellant’s Opening Brief
- 27 March 2023 – Appellees’ Opening Brief
- 28 April 2023 – Appellant’s Reply

Appellees consent to this motion.

Musgrave has good cause for this motion. The undersigned is in discussions with several potential *amici curiae* about the possibility and logistics of their involvement in this case, and he intends to continue these discussions and

coordinate his efforts with any individuals or entities who end up submitting such briefs, so as to reduce unnecessary duplication of arguments. The other subsequent modifications of the schedule are proposed to account for conflicts with the respective work schedules of Appellees' counsel and the undersigned. It is therefore in the interest of judicial economy for the Court to grant this Motion.

This is the second extension requested for this Brief. The undersigned apologizes for the lateness of this Motion, but the discussions to which he refers above did not begin in earnest until this week.

Date: January 11, 2023

Respectfully submitted,

/s/ Kelly B. McClanahan  
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*Counsel for Appellant*

**CERTIFICATE OF COMPLIANCE**

I hereby certify that the foregoing filing contains 318 words, and was prepared in 14-point Times New Roman font using Microsoft Word 2016.

/s/ Kelly B. McClanahan  
Kelly B. McClanahan, Esq.